



SCOTT M. MATHESON
Governor

OIL, GAS, AND MINING BOARD

GORDON E. HARMSTON
Executive Director,
NATURAL RESOURCES

STATE OF UTAH

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF OIL, GAS, AND MINING

1588 West North Temple
Salt Lake City, Utah 84116
(801) 533-5771

CLEON B. FEIGHT
Director

CHARLES R. HENDERSON
Chairman

JOHN L. BELL
C. RAY JUVELIN
THADIS W. BOX
CONSTANCE K. LUNDBERG
EDWARD T. BECK
E. STEELE McINTYRE

July 9, 1979

Mr. Don Crane
Director, Region 5
Office of Surface Mining
1823 Stout Street
Denver, Colorado 80202

Re: Proposed Coal Exploration
Kaiser's South Lease
Meadow Lark Farms (AMAX)
Emery County, Utah
EXP/015/033

Dear Mr. Crane:

The Division is concerned about three of the comments offered by OSM , regarding the proposed coal exploration plan of Meadow Lark Farms, a subsidiary of AMAX. The comments were presented to Mr. Jackson Moffitt, Area Mining Supervisor, USGS in a memo dated June 19, 1979.

The first comment we are concerned about states, "Alternate routes should be, provided for the 8 miles of new access roads, that are indicated to be established mainly in the ephemeral channels. Should excessive channelization and alternations become necessary so as to accomodate large vehicles, alternate routes should be considered and utilized." Because of the steep, narrow nature of the terrain of the Book Cliffs, utilizing ephemeral channels for temporary access has proven to be the least damaging route. Generally, minimal earth work is required to gain access in these channels. Also, the surface material is less rocky than the slopes above the channel. If these channels cannot be utilized, the other alternatives, in many cases, is either to construct a road on the slopes which tends to be much more damaging and is less likely to be properly reclaimed, or to allow no access.

The second comment we are concerned about states, "It is suggested that the overall grade of access roads should not exceed 10 percent." Generally, an access road constructed for exploratory drilling is constructed in a manner that minimizes earth work and ground disturbance. In many cases no ground disturbance other than shrub removal is needed. If minimal or no ground disturbance is necessary, a grade greater than ten percent is allowable. If drainage control is provided, minimizing ground disturbance is oftentimes preferable to restricting grades to less than ten percent.

Mr. Don Crane
Page Two
July 9, 1979

The third comment we are concerned about states, "If drill sites are to be located on agricultural land, the cemented level should remain below the accepted depth for the given type of agricultural activity." No agricultural land exists where the drill sites are proposed.

The Division agrees that native species should be incorporated into the seeding mixture and an archaeological clearance should be provided prior to conducting operations.

Finally, the Division would like to invite the members of your staff to visit our coal producing areas to obtain an overview of our operations. We feel that both the OSM staff and the Division staff would benefit from such a reconnaissance visit. A time in mid-August would allow the observation of both the mines and exploratory drilling.

Sincerely,



K. MICHAEL THOMPSON
ENGINEERING GEOLOGIST

KMT/pf
cc: Jackson Moffit, USGS
Mark Mackiewicz, BLM Price